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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-09-0972 MHP
)	
12 Plaintiff,)	STIPULATION & PROPOSED ORDER
)	CONTINUING SENTENCING
13)	
14 vs.)	Current Hearing Date: July 26, 2010
)	Time: 10:00 a.m.
)	Judge: Hon. Marilyn Hall Patel
15 FRANK LAEREMAN,)	
)	Proposed Hearing Date: August 23, 2010
16 Defendant.)	Time: 9:00 a.m.
)	Judge: Hon. Marilyn Hall Patel
17)	

18 The above-captioned case is currently on calendar at 10:00 a.m. on July 26, 2010, for
19 sentencing. Lead counsel for Mr. Laereman, Geoffrey Hansen, had a family emergency out-of-
20 state and is unavailable until next week. Because he has not been in the office, Mr. Hansen was
21 not able to schedule a meeting between Mr. Laereman and a psychologist. United States
22 Probation Officer Charlie Mabie is waiting for the report of the psychologist to complete his final
23 pre-sentence report. Accordingly, counsel for Mr. Laereman respectfully requests that the Court
24 vacate the July 26th hearing and add the matter to the Court's calendar on August 23, 2010, at
25 9:00 a.m.

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Undersigned defense counsel has confirmation from AUSA Tom Moore of his availability for the proposed date, and also confirmed with Your Honor's Courtroom Deputy that the Court is available on the proposed hearing date and time. Accordingly, the parties jointly request that the Court vacate the July 26, 2010, hearing date and re-set the matter for August 30, 2010, at 9:00 a.m.

IT IS SO STIPULATED.

July 15, 2010
DATED

/s/
TOM MOORE
Assistant United States Attorney

July 15, 2010
DATED

/s/
LOREN STEWART for GEOFFREY HANSEN
Attorneys for Frank Laerean

[PROPOSED] ORDER

For good cause shown, the status conference now scheduled for Monday, July 26, 2010 is vacated. The matter shall be added to the Court's calendar on Monday, August 23, 2010 at 9:00 a.m.

IT IS SO ORDERED.

7/22/2010
DATED

